

UNITED STATES OF AMERICA	*	Criminal 99-226(HL)
Plaintiff	*	
V.	*	
REYES H. ORTIZ-FUENTES	*	
Defendant	*	

URGENT REQUEST FOR RELIEF

TO THE HONORABLE COURT:

COMES NOW defendant Reyes H. Ortiz-fuentes represented by the undersigned attorney and respectfully states and prays:

1. On July 9, 2004 the government filed an Informative Motion requesting that a lien recorded to defendant's property in Coamo, on August 21, 2003, in the amount of \$5,000. to secure the payment of a fine imposed in the criminal case be remanded by order of this Court.
2. The defendant satisfied the fine of \$5,000.00 on November 25, 2003, almost a year ago.
3. Even though the fine was paid a year ago the lien continues to encumber his property which has caused defendant serious economic damages as he has not been able to refinance or sell the property.
4. There is no justification for the lien.
5. The property upon which the government placed the lien is described in deed #133 of December 16, 1999 as:

"RUSTICA": Predio de terreno sito en el Barrio San Ildefonso del término municipal de Coamo, Puerto Rico, con un área superficial de treinta punto cero cero setecientas veintinueve cuerdas (30.00729 cds), equivalentes a ciento diecisiete mil novecientos cuarenta punto sesenta y cinco metros cuadrados (117,940.65 mc), en lindes por el NORTE con la

finca de Pablo Aponte; por le SUR con Juan A. Quevedo; por el ESTE, Carretera Número PR-catorce (PR-14); por el OESTE, con Pablo Aponte..... Inscrita al folio setenta y cuatro (74) del tomo doscientos treinta y siete(237) de Coamo, finca número trece mil trescientos dieciséis (13,316), inscripción primera(1ra).....

6. It is requested that this Honorable Court afford immediate relief to defendant by issuing an order to cancel said lien in the registry of the property.

CERTIFICATE OF SERVICE: I hereby certify that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CM/ECF system by AUSA Irene Feldman, U.S. Attorney's Office.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of November, 2004.

S/ Lydia Lizarribar-Masini
LYDIA LIZARRÍBAR-MASINI
USDC 124301
14 O'NEILL ST. SUITE A
HATO REY, PR 00918
TEL. 250-7505 FAX. 758-4512
E-mail: lizarribar@prtc.net